

Judicial Grievance – IMLS / RI v. Trump

SUBMISSION ADDRESS

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To the Honorable Judges of the United States Court of Appeals for the First Circuit:

This judicial grievance is submitted in connection with constitutional and statutory concerns arising from executive actions affecting the Institute of Museum and Library Services (IMLS) and their relevance within *RI v. Trump*. The grievance seeks judicial review to prevent irreparable harm to statutory governance, public education, cultural infrastructure, and the public's First Amendment right to access information free from political interference.

IMLS is established by the Museum and Library Services Act (20 U.S.C. § 9101 et seq.). Any executive effort to defund, dismantle, or obstruct the agency—absent congressional repeal—violates:

- **Appropriations Clause** (U.S. Const. art. I, § 9, cl. 7)
- **Separation of Powers** under Articles I and II
- **Administrative Procedure Act** (APA), 5 U.S.C. § 706
- **First Amendment protections** related to access to knowledge

The Supreme Court's ruling in *Clinton v. City of New York*, 524 U.S. 417 (1998), confirms that the Executive Branch may not unilaterally alter, nullify, or suspend congressionally enacted programs. Likewise, *Board of Education v. Pico*, 457 U.S. 853 (1982), affirms that government may not suppress access to information for ideological reasons.

Dismantling or defunding IMLS would harm essential public systems, including:

- State library agencies
- School literacy and early learning programs
- Tribal library sovereignty
- Rural and underserved community information access
- National museum, archival, and preservation infrastructures

This grievance respectfully requests that the Court:

1. Halt any executive efforts to dissolve, defund, or politically compromise IMLS without congressional authorization.
2. Preserve all statutory programs and grant systems pending judicial review.

3. Investigate administrative actions that violate the APA.
4. Affirm separation of powers protections prohibiting unilateral executive dissolution of statutory agencies.
5. Prevent irreversible harm to literacy, democratic access, cultural preservation, and public educational rights.

IMLS is a cornerstone of democratic access to information. Its dismantling would cause permanent harm to millions who rely on public libraries, museums, archives, and educational programs nationwide.

Respectfully submitted,

[Your Name]

[Your City, State]

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[Date]